

See file 64

JUN 12 1994

TECHNICAL STATUS REPORT

CH2M HILL

PREPARED FOR: Tom Post/EPA Region 10

DATE: June 9, 1995

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TECHNICAL STATUS REPORT

PREPARED FOR: Tom Post/EPA Region 10

COPIES TO: Byung Maeng/Ecology

PREPARED BY: Liz Luecker/CH2M HILL

DATE: June 9, 1995

SUBJECT: Rhône-Poulenc Monthly Status Report

SITE NAME AND LOCATION: Rhône-Poulenc Inc./Seattle Plant
Tukwila, WA

REPORTING PERIOD: May 1 through May 31, 1995

PROJECT: NPE35051.P1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RPI) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

Progress Made This Reporting Period

Task P1-Project Management

The new project manager at EPA for the RCRA Corrective Action will be effective June 17 and is Sylvia Burges. She can be reached at (206)553-1254.

Edwin Liu/RPI, Paul Nemanic/RPI, Richard Faulkner/RPI, Doug Holsten/CH2M HILL, Martin Cobb/CH2M HILL, and Liz Luecker/CH2M HILL met with Tom Post/EPA 10, Rene Fuentes/EPA 10, and Byung Maeng/Ecology NWRO at Bogle and Gates' Seattle Office on May 10, 1995 to discuss EPA's and Ecology's comments on the Draft RFI Report and RPI's response to these comments. The minutes for this meeting were sent out on May 16.

Task A2-Applicable Regulations and Permits

Storm Water Permitting.

A letter was sent to METRO on May 31 requesting an extension of 90 days for discharging storm water to the METRO sewer system. This will allow time to complete sediment sampling in the underground sewer lines on the site, to clean the lines, and to complete construction of the storm water system modifications that direct storm water to the Duwamish Waterway.

A SAP for the sewer sediment sampling that referenced applicable portions of the RFI Workplan was sent to T. Michelsen/Ecology for review and comment on May 22. Dr. Michelsen provided comments on May 22. The SAP was revised and sent to EPA and Ecology on May 24.

The sediments in the storm sewers (both those that will be re-activated and those that may have discharged to the sediments in the past) were sampled May 24-25. Samples were taken from accessible manholes and catch basins where sediment was present or, where no manhole or catch basin was accessible, an outfall line was broken and samples taken. The samples were analyzed for semivolatile organics, metals, PCBs, BTEX, and total organic carbon; in addition, the samples from lines leading to old outfalls were also analyzed for pH, grain size, and specific gravity. Samples were analyzed in accordance with QA/QC procedures in the RFI Workplan. Preliminary analytical results should be available during the week of June 5.

Task A3-Interim Measures

Vanillin Building Demolition

In April, fish toxicity testing was performed by Lauck's Laboratories on a sample of green, copper-containing residue collected from the surface of discolored concrete and discolored soil of the Vanillin Building foundation. Based on these test results, the discolored material was classified as a Washington State Extremely Hazardous Waste. Discolored concrete and discolored soil from the Vanillin Building foundation was separated from the remaining debris and was landfilled at Chemical Waste Management's facility in Arlington, Oregon during May. Four loads were taken away: two on May 2, one on May 15, and one on May 18. A partial load is left; this is being held pending the results of the sewer sediment sampling so that the sewer sediment can be sent with it if the sediments are contaminated.

PCB-Contaminated Compressor Pad.

Water collected during the excavation is being stored in a rented tank while awaiting disposal. The water contains 420 ppb PCBs. Activated carbon has been chosen to remove the PCBs from the water. An activated carbon filter was purchased from Calgon by CEcon; it was to have been delivered during the last week of May but had not been received by June 5. A tracer was put on the shipment on June 6. The filter media and recovered sediment will be incinerated, and the water will be discharged to METRO if it contains <5 ppb PCBs and meets the routine METRO discharge requirements for toluene, chromium, and copper.

LNAPL

As in April, Buzz Rahier/RPI detected LNAPL in both H10 and MW18. Buzz is monitoring wells H10 and MW18 once per week, depending on his workload. The remaining wells were monitored monthly as they have been in the past. During May, the amount of LNAPL measured in H10 ranged from 0.125 to 0.010 feet; the amount of LNAPL measured in MW18 ranged from 0.16 feet to not detectable by the end of the month. The remaining wells surveyed did not contain LNAPL beyond a film or sheen. Information on the LNAPL thicknesses is attached.

Task A5-RFI Implementation

The last batch of groundwater data were received May 8 and are in validation. The Round 3 groundwater data were input into the data base during the week of May 30.

The seep and surface water data were received May 12. These data are currently in data validation; the validation results should be available by the end of June.

Task A8-Revised RFI Report

The Response to EPA and Ecology Comments was sent out on May 6.

A draft incorporating EPA and Ecology comments into the RFI was sent to RPI for review on May 25.

Deliverables Submitted

The April Progress Report was submitted to U.S. EPA on May 10, 1995.

The Response to EPA and Ecology Comments on the Draft RFI Report was sent to EPA and Ecology on May 6.

A draft SAP for the sewer sediment sampling was sent to T. Michelsen/Ecology for comment on May 22, and the final SAP incorporating her comments was sent out on May 24.

Progress Planned For Next Reporting Period

Task P1-Project Management

RPI will meet with EPA during the week of June 19 to meet the new EPA project manager and discuss project issues.

Task A3-Interim Measures

Continue to monitor LNAPL thicknesses in monitoring wells.

We will attempt to lower the concentration of PCBs in the PCB-contaminated water to less than 5 ppb; the cleaned water will be discharged to METRO, and the contaminated carbon will be incinerated.

Task A5-RFI Implementation

A letter discussing the relative merits of the two chromium speciation methods used in the Round 3 groundwater sampling and explaining why Method 7197 will be used for future analyses will be sent to EPA.

Validation of the Round 3 groundwater sampling and the seep sampling should be done by mid to end of June. The Round 3 groundwater data appear to have only minor quality issues, mainly the need for more data qualifiers. These issues should be resolved during the week of June 12; however, the data can be used in the risk assessment as soon as it is verified in the data base. The Round 3 data in the data base will be checked against the chain-of-custody sheets to verify that all the laboratory data are in the data base; this check should be finished during the week of June 5. Seep data validation should be complete by the end of June.

The Round 3 Data Technical Memorandum will be prepared once the data are validated; this effort should begin in June.

The samples of sediments in the storm and process sewers (both those that will be re-activated and those that may have discharged to the sediments in the past) are being tested. These samples are being analyzed for semivolatile organics, metals, PCBs, toluene, and total organic carbon; those samples taken from the outfall discharge lines are also being analyzed for pH, grain size, and specific gravity. Preliminary results of these analyses should be available the week of June 5. Work will start on a memorandum documenting the results of these analyses.

Task A8-Revised RFI Report

The final RFI insert pages incorporating EPA's and Ecology's comments will be completed and sent to EPA and Ecology by June 19.

Task R1-Risk Assessment/proposed Media Cleanup Standards Report

Risk assessment assumptions need to be agreed to by EPA and the RPI risk assessment team before additional work on the risk assessment can be done. RPI will send a letter to EPA addressing assumptions for the risk assessment.

rhône-p/MSR5-95.EPA

RHONE POULENC - MARGINAL WAY FACILITY MONTHLY LNAPL SURVEY LOG

Floating Product Layer Thickness in Feet

MW	6/7/94	6/8/94	6/17/94	8/4/94	9/8/94	10/6/94	11/3/94	12/5/94	1/11/95	2/17/95	3/23/95	3/27/95	3/28/95	4/27/95	4/28/95	5/31/95
H10	0	0	Film	Film	Film	0	0	0	0.26 ¹	2.01	0.01	1.6		0.063		0.01
H1			0	Sheen	0	0	0	0	Sheen ⁴	0		0		0		0
MW12	0	0	0.007 ¹	Sheen	Film	Film	0.005	0	Sheen ⁴	0.16		Sheen		Film ¹		Film
H11			0	Film	0.01	0.01	0.005	Film	0.04 ³	Sheen ⁴		0		0		0
DM7			0	0	0	0	0	0	0	0		0			0	0
H9			0	0	Sheen	0	0	0	0	0		0		0		0
H6			0	0	Sheen	0	0	0	0	0		0			0	0
DM2A			0	0	0	0	0	0	0	0		0			0	0
DM2B			0	0	0	0	0	0	0	0		0			0	0
DM8			0	0	0	0	0	0	0	0		0		0		0
A9			0	0	0	0	0	0	0	---	0			0		0
DM3A			0	0	0	0	0	0	0	0	0			0		0
DM3B			0	0	0	0	0	0	0	0	0			0		0
A2			0	0	0	0	0	0	0	0	0			---	---	---
A4			0	0	0	0	0	0	0	0	0 ¹			0		0
DM4			0	0	0	0	0	0	0	0	0	0			0	0
B4			0	0	0	0	0	0	0	0	0	0		0		0
B2			0	0	0	0	0	0	0	0	0	0		0		0
DM5			0	0	0	0	0	0	0	0 ⁶		0		0		0
B1A			0	0	0	0	0	0	0	0	0			0		0
B1B			0	0	0	0	0	0	0	0	0			0		0
C1			0	0	0	0	0	0	0	0	0			0		0
DM6			0	0	0	0	0	0	0	0	0			0		0
B5			0	0	0	---	---	---	---	---			0	0		0
G3			0	0	0	0	0	0	0	0		0		0		0
G1			0	0	0	0	0	0	0	0		0		0		0
B6			0	0	0	0	0	0	0	0		0		0		0
MW13					0	0	0	0	0	0		0		0		0
MW14					0	0	0	0	0	0		0		0		0
MW15					0.021	Film	0.01	Film	0.01 ³	0		Sheen			0	0
MW16					0.005	0	0	0	0	0		0			0	0
MW17					0	0	0	0	0	0		0		0		0
MW18					0	0	0	0	0	Sheen ⁴		Sheen		0.063 ⁵		0
MW19					0.01	0.021		0	Sheen ⁴	Sheen ⁴		Sheen		Sheen		0
MW20					0	0	0	0	0	0		0		0		0
DM1A											0					
DM1B											0					
E3											Sheen ⁷					

¹ Removed product layer with bailer.

² Buried under rubble.

³ Solinst Model 121 oil/water interface probe.

⁴ Sheen noted when measurement device was placed in clean water.

⁵ Casing cover/PVC pipe bent; well could not be accessed.

⁶ No sheen noted when measurement device was placed in clean water, but water turned light brown after probing.

⁷ Orange/rust colored residue on probe.

⁸ Gobules.

⁹ Dark Phase.

Note: Shaded areas reflect current LNAPL survey.

RHONE POULENC - MARGINAL WAY FACILITY
DAILY LNAPL SURVEY LOG
Floating Product Layer Thickness in Feet

MW	2/21/95	2/22/95	2/23/95	2/24/95	2/27/95	2/28/95	3/6/95	3/7/95	3/8/95	3/9/95	3/10/95	3/13/95	3/14/95	3/15/95	3/16/95	3/20/95	3/21/95	3/22/95	3/23/95	3/27/95	3/30/95	3/31/95	4/3/95	4/5/95	4/7/95	4/13/95	4/18/95	4/25/95	4/26/95	4/27/95	4/28/95	5/4/95	5/10/95	5/25/95	5/31/95
H10/am		0.01	0.01	0.02	1.04 ¹	0.79 ¹	0.61 ³	0.85 ³	0.67 ³	0.56 ³	0.22 ³	0.01 ²	Film	Film	0.01	0.18 ¹	0.01	0.70	0.01	1.58 ¹	1.23	1.08	0.667	0.667		0.333			0.198 ¹				0.125		
H10/pm	0.13	0.01		0.03 ³	0.21 ^{1,3}		0.86 ³	0.41 ¹		0.22 ³	0.02	Film	Film	Sheen		0.02	0.11 ³			1.60	1.40	1.46	1.125	0.667	0.563		0.333	0.292 ¹		0.063	0.042	0.01		0.021	0.01
H1										0	0			0	0		Sheen		0																
MW12										0.07 ³	Sheen			Sheen ²	Sheen		Film		0																
H11										0	0			0	0		Sheen		0																
H9										0	0			0	0		Sheen		0																
H6										0	0			0	0		Sheen		0																
MW15										0	0			Sheen ²	0		0			0															
MW16										0	0			0	0		Sheen			0															
MW18/am										0					0								0.52	0.54		0.42				0.31					
MW18/pm											0			0			0			Sheen		0.87	0.52	0.4	0.13		0.29	0.32		0.063	0.29	0.16		0.04	0
MW19										0	Sheen			0 ²	0		Sheen			Sheen															

¹ Removed product layer with bailer.
² Floating crud layer.
³ Solinst Model 121 oil/water interface probe.